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9 Attorneys for Bankruptcy Claimants,
10 STEPHEN PUTNAM HERRIN, individually
11 and as Trustee of the DONALD E. RYCKMAN
12 and ROSEMARY H. RYCKMAN
13 REVOCABLE
14 TRUST DATED FEBRUARY 25, 1999

15 Matthew W. Grimshaw, Esq. (SBN 210424)
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21 Counsel for Robins Cloud LLP

22 UNITED STATES BANKRUPTCY COURT
23
24 NORTHERN DISTRICT OF CALIFORNIA
25
26 SAN FRANCISCO DIVISION

27 In re
28 PG&E CORPORATION and PACIFIC GAS
AND ELECTRIC COMPANY

Debtors

Case No. 19-30088 (DM)

Chapter 11

REQUEST FOR RELIEF UPON
DEFAULT IN SUPPORT OF MOTION
FOR ORDER AUTHORIZING
WITHDRAWAL OF COUNSEL;
DECLARATION OF MATTHEW W.
GRIMSHAW, ESQ. IN SUPPORT

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1 PLEASE TAKE NOTICE THAT counsel for the law firm of Robins Cloud LP (the "Firm"),
2 attorneys of record for Bankruptcy Claimant, Stephen Putnam Herrin, individually and in his
3 capacity as Trustee of the Donald E. Ryckman and Rosemary H. Ryckman Revocable Trust Dated
4 February 25, 1999 ("Trust") provides this request for relief upon default and statement of non-
5 opposition pursuant to B.L.R. 9014-1(b)(3)(A) as follows:

6 On June 26, 2020, as Dk. Nos. 8139, 8140, and 8141, counsel filed on behalf of the Firm, a
7 Notice of Motion and Motion for Order Authorizing Withdrawal of Counsel ("Motion");
8 Memorandum of Points and Authorities; Declaration of Rex Grady, Esq. in Support of Motion for
9 Order Authorizing Withdrawal of Counsel; and Certificate of Service in support of Motion and
10 Declaration.

11 On July 14, 2020, as Dk. Nos. 8397 and 8398, a notice of errata with regard to the notice of
12 Motion ("Notice"), and Certificate of Service in support of Notice, was filed.

13 The Motion requests relief for the Firm of Robins Cloud LLP to be permitted to withdraw as
14 counsel for the Trust, and for the withdrawal to be retroactive to the dates on which the two Claims
15 in this matter were withdrawn, which are May 8, 2020 with respect to the Claim for the Trust (Claim
16 No. 91749) and May 11, 2020 with respect to the Claim for Mr. Herrin (Claim No. 91428).

17 **Declaration of Matthew W. Grimshaw**

18 I, Matthew W. Grimshaw, say and declare as follows:

- 19 1. I am an individual over 18 years of age and competent to make this Declaration.
20 2. I am an attorney at law duly admitted to practice before all courts of the State of
21 California, in addition to the United States District Court for the Northern District of California.
22 3. I am counsel for the law firm of Robins Cloud LP (the "Firm"), attorneys of record
23 for Bankruptcy Claimant, Stephen Putnam Herrin, individually and in his capacity as Trustee of the
24 Donald E. Ryckman and Rosemary H. Ryckman Revocable Trust Dated February 25, 1999 ("Trust").¹

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27 ¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other
28 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client
relationship with Mr. Herrin or the Trust.

1 4. The facts set forth below are true and within the scope of my personal knowledge,
2 and if called upon to do so I could and would testify competently to these facts.

3 5. On June 26, 2020, as Dk. Nos. 8139, 8140, and 8141, I caused my office to file on
4 behalf of the Firm, a Notice of Motion and Motion for Order Authorizing Withdrawal of Counsel
5 (“Motion”); Memorandum of Points and Authorities; Declaration of Rex Grady, Esq. in Support
6 of Motion for Order Authorizing Withdrawal of Counsel; and Certificate of Service in support of
7 Motion and Declaration.

8 6. On July 14, 2020, as Dk. Nos. 8397 and 8398, I caused my office to file a notice of
9 errata with regard to the notice of Motion (“Notice”), and Certificate of Service in support of Notice.

10 7. I have reviewed the Court’s docket in this Chapter 11 Case.

11 8. No response or opposition has been filed as to the Motion and/or the Notice, and I
12 have received no such response or opposition.

13 9. A proposed order will be lodged concurrently as provided for in B.L.R. 9014-
14 1(b)(3)(A).

15 I declare under penalty of perjury that the foregoing is true and correct is true and correct.

16 Executed on July 26, 2020.

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Matthew W. Grimshaw